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Timothy Dore  
Chapter 7  
Hearing Location: Seattle  
Hearing Date: 04/01/2022  
Hearing Time: 9:30 a.m.  
Response Date: 03/25/2022

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

Alex Lenh and Nga Nguyen

Debtors.

Chapter 7

**Bankruptcy No. 17-15050**

**DEBTORS' RESPONSE TO  
TRUSTEE'S MOTION TO  
COMPEL DEBTORS'  
COOPERATION**

DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO COMPEL DEBTORS' TO  
COOPERATE WITH MARKETING OF RESIDENCE

COMES NOW, Ty Ho, attorney for debtors, moves for an Order Denying Trustee's Motion to Compel Debtors to Cooperate with Marketing of Residence. This response is supported by debtors' declaration and the following:

1. This case was filed on November 19, 2017.
2. One of the assets listed by the debtor was the residence located at 2934 S. Webster Street, Seattle, WA 98108 (the "Residence"). Debtors scheduled the Residence value at \$284,000, and having liens totaling \$249,995.41
3. Although debtors received a discharge, this case remained open for Trustee Ronald Brown to administer Debtor Nga Nguyen's personal injury claim, which was recently settled.
4. Because of the uptake in the real estate market, Trustee Ronald Brown wishes to sale the Residence, which is 4 years after Discharge date.
5. Debtors wish to keep their house to live with their children. Trustee's action forces debtors with no other choice then to convert their chapter 7 to chapter 13.

*Debtors' Response to Motion to Compel - Page 1 of 2*

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- 1 6. Debtors have filed their Motion to Convert from Chapter 7 to Chapter 13. Debtors are  
2 eligible and are entitled to such conversion.  
3 7. The conversion will release Chapter 7 Trustee of all of his responsibilities under this  
4 case, including selling the Residence.

5 WHEREFORE, Debtors respectfully request this Court Deny Trustee's Motion to Compel Debtors to  
6 Cooperate with Marketing of Residence.

7 DATED this 17<sup>th</sup> day of March, 2022.

8 /s/Ty Ho  
9 Attorney for Debtors/WSBA # 35808  
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